

EXHIBIT 61

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	X	
	:	
In Re: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	
	:	
ALL PARTS	:	Case No.: 12-MD-02311
	:	Honorable Marianne O. Battani
	:	
THIS RELATES TO: ALL CASES	:	
	:	
	:	
	:	

**DECLARATION OF DOUGLAS R. MEYER IN SUPPORT OF SUBARU OF INDIANA
AUTOMOTIVE, INC.'s OPPOSITION TO MOTION TO COMPEL**

I, Douglas R. Meyer, hereby declare under penalty of perjury as follows:

I am employed as Senior Manager and General Counsel of Subaru of Indiana Automotive, Inc. ("SIA"). I have been employed by SIA since December 9, 1996. In my current role, I am responsible for managing SIA's Legal Department, Human Resources Department, and Corporate Social Responsibility Department. I am authorized to provide this declaration on behalf of SIA. Some of the information and facts within the declaration are not within my personal knowledge, but have been assembled by authorized employees of SIA who have verified to me that the information and facts are true and accurate.

Subaru of Indiana Automotive, Inc.

1. SIA is an automobile manufacturer and assembler incorporated in Indiana with its principal place of business located in Lafayette, Indiana. SIA is a wholly-owned subsidiary of Fuji Heavy Industries Ltd. ("FHI"), located in Japan.

2. SIA was first incorporated in March 1987 (in Indiana) as Subaru-Isuzu Automotive Inc., a joint venture between FHI and Isuzu Motors Limited ("Isuzu"). SIA began

vehicle production in September 1989. During the period of the joint venture, SIA produced various Subaru and Isuzu vehicles, and assembled the Honda Passport under contract with Honda.

3. Effective January 1, 2003, FHI and Isuzu dissolved the joint venture, and Isuzu transferred all its shares in the joint venture to FHI. At that time, SIA – renamed Subaru of Indiana Automotive, Inc. – became a wholly-owned subsidiary of FHI. After the joint venture dissolved, SIA continued producing certain Isuzu vehicles for a short time under contract with Isuzu.

4. SIA has manufactured the following Subaru vehicles during its corporate lifetime:

Legacy:	1989 – present
Outback:	1994 – present
Baja:	2002 – 2006
Tribeca:	2005 – 2014

5. From the time it began vehicle production in 1989, to the present, SIA has sourced parts only for the Subaru vehicles it manufactures. SIA has never sourced parts for the Isuzu, Honda, or Toyota vehicles it produces.

6. Throughout its corporate existence, SIA has manufactured Subaru vehicles for both later U.S. sale and export. However, SIA has never sold vehicles to dealers. Rather, SIA – directly or through a subsidiary – has sold 100% of the Subaru vehicles it produces for later sale in the U.S. to Subaru of America, Inc. ("SOA"), a wholly-owned subsidiary of FHI.

7. SIA does receive or maintain data in the ordinary course of business regarding retail purchasers of vehicles SIA manufactures for later sale in the U.S. (Request 4(b)).

8. SIA does not participate, and has never participated, in determining the prices at which SOA sells vehicles to dealers. SIA did not participate in any pricing decisions for the Isuzu and Honda vehicles it produced, and does not participate in any pricing decisions for the

Toyota vehicles it produces. SIA simply does not have much of the "downstream" information the Parties seek.

9. There is not one definitive way to calculate market share within the automobile production industry. There are a variety of reliable, authoritative sources of market information.

10. SIA has tracked U.S. market share for Subaru vehicles as a whole since 2005, using data for SOA published in *The Wall Street Journal* ("WSJ"). Based on my experience within the industry, I consider this to be a reliable and authoritative source of such data. I am informed and believe that SOA has, since SIA's inception in 1989, distributed all Subaru vehicles – both imported (manufactured by FHI) and domestic (manufactured by SIA) – in the United States.

11. According to the WSJ data, which I consider to be reliable and authoritative, SOA's U.S. market share for imported and domestic Subaru cars and light trucks remained at or below 1.5% until near year-end, 2008. It did not rise above 3.0% until near year-end 2013. See Exhibit A to this declaration.

12. The percentages in paragraph 11 reflect U.S. market share for all Subaru cars and light trucks, including those produced and imported by SOA's parent company, FHI. Therefore, the market share for Subaru vehicles assembled by SIA is considerably less. For example, FHI, not SIA, manufactures the Subaru Forester, which is currently the top-selling Subaru vehicle in the U.S., as well as the Subaru Crosstrek, the most recent third-best seller for Subaru in the U.S.

13. SIA also tracks the number of Subaru model vehicles it ships, by month and by year. Exhibit B to this declaration is a true and accurate chart showing SIA's shipping volume. These numbers include, where applicable, both vehicles for export, and vehicles sold to SOA for distribution in the U.S.

Overall Breadth of the Subpoena

14. I have reviewed the subpoena served on SIA, as well as the Parties' Motions to Compel Discovery from the non-party OEMs ("Op. Br."). I understand the serving Parties seek information in response to the following requests: 1(a)-(g), (l), (m); 3; 4(a)(1)-(2); 4(a)(3)(a)-(e), (h), (k); 4(a)(4), (7), (8), (13); 4(b), (e), (h), (j); 5; 13; 14(c); 15; 16; 22; 23(2); 27; 28 (last two sentences); 30; 33; and 34. *See* Op. Br. 2 n. 6. I also understand that certain Parties are seeking documents in response to Request 31, which seeks "all documents relating to negotiations or communications with defendants [and others]" relating to this lawsuit.

15. Contrary to the Parties' assertion, SIA is not "constantly involved in complex litigation," does not have a "large legal department[]," and is not "well equipped to respond to discovery requests." (Op. Br. 16). In fact, apart from five (5) non-party subpoenas received from the Department of Justice related the alleged conspiracy at issue in these lawsuits, SIA has never been involved in "complex litigation" involving more than a nominal discovery burden. SIA's legal department consists of three (3) attorneys, a Chief Legal Officer, General Counsel and Assistant General Counsel, although the Chief Legal Officer is also the Executive Vice President for SIA and does not generally participate in legal matters. SIA has one paralegal who also serves as the administrative assistant for the Executive Vice President. The General Counsel and Assistant General Counsel have wide-ranging responsibilities for all legal issues, including but not limited to contract, employment, environmental and employee benefit matters, and also serve in a variety of other managerial roles that consume a substantial portion of their time.

16. If SIA is compelled to respond to this subpoena in full, SIA's anticipated compliance efforts will require a significant diversion of valuable and limited human resources, and will significantly disrupt SIA's business.

17. Because SIA has never sold vehicles to dealers, it does not (as discussed below) possess much of the “downstream” information the Parties seek.

18. However, the Parties seek a broad swath of "upstream" (part sourcing) information that – to the extent SIA possesses it and it is reasonably available – will be difficult, expensive, time-consuming, and very disruptive to produce.

19. For example, before November 2007, SIA did not have an electronic process (database) for submitting and approving price quotations and generating purchase orders. This process was manual and occurred on paper, and SIA has not digitized the paper records. To the extent SIA has retained them (under its document retention policy and/or subject to a legal hold), they are stored as SIA keeps them in the ordinary course of business, including in boxes in a locked "cage," and in more than 70 file cabinets. There is no central index.

20. In order to search these paper documents for relevant, responsive information, SIA would divert 4 individuals from the Information Systems and Purchasing Departments for, I anticipate, at least 6-8 weeks. To perform this task effectively and as efficiently as possible, the individuals selected will need to have sufficient knowledge and understanding of SIA's history and operations, the issues in this lawsuit, and the information requested. I anticipate this will require several hours of training time, after which these individuals will have to step away from their ordinary duties for some or all of the workday until the task is complete. The documents will then require legal review for relevance and privilege.

21. In order to fully comply with the subpoena, SIA will also have to search for responsive documents from custodians in its Production/Control Section, Purchasing Department, and Finance Department. This implicates approximately seventy-five (75) current employees, as well as the many separated employees who occupied these positions during their

tenure with SIA. Identifying these former employees and tracking their retained documents will further divert managers and human resources staff.

22. SIA stores accounts payable information on magnetic tapes. Searching these tapes for relevant, responsive information will be particularly difficult and time-consuming, and will require SIA to divert a member of its Information Systems Department staff.

23. As discussed below, the nature of the defendant suppliers' relationship with SIA, and the information exchanged during the sourcing process, necessarily means defendant suppliers already possess a substantial portion of the upstream information the Parties seek from SIA. This includes purchasing information for the parts and components in all SIA-manufactured Subaru models for which one of the defendant suppliers was the successful bidder. It also includes detailed information about the request for quotation ("RFQ") process in which they participated. Regarding downstream information, SIA has never sold vehicles to dealers.

Upstream Purchasing Information

24. The Parties seek compliance with 35 requests (including subparts) relating to upstream purchasing information of the components and assemblies at issue. The upstream purchasing requests include 1(a), 1(b), 1(c), 1(d)(1), 1(d)(2), 1(d)(3), 1(e), 1(f), 1(g)(1), 1(g)(2), 1(g)(3), 1(g)(4), 1(g)(5), 1(g)(6), 1(g)(7), 1(g)(8), 1(g)(9), 1(g)(10), 1(g)(11), 1(g)(12), 1(g)(13), 1(g)(14), 1(g)(15), 1(g)(16), 1(g)(17), 1(g)(18), 1(g)(19), 1(l), 1(m), 3, 14(c), 23(2), 28 (last two sentences), 30, and 33.

25. The Parties' requests for upstream purchasing documents include requests for information related to specific RFQs or sourcing agreements SIA has issued and entered over the past [20] years. (Requests 1(g), 3, 14(c), 23(2), 30).

- a. To generally describe SIA's RFQ process: SIA currently maintains an RFQ database into which prospective component and assembly suppliers

can log to submit quotation information. To complete its Supplier Quotation, each prospective supplier must provide the RFQ# (Request 1(g)(1)), part description (Request 1(g)(4)), new price and any previous price* (Request 1(g)(13)), reason code for any price change, including change codes for cost change by VA design and cost increase by design change (Request 1(g)(12)), piece price adjustments (Request 1(g)(18), and on-site engineering services* (Request 1(g)(10)). To the extent SIA selects a particular entity as a supplier of components or assemblies, SIA and the supplier exchange information relating to any resulting agreement** (Requests 1(l) and 3), price adjustments or reductions* (Request 23(2)), and any "most favored nation" provisions* (Request 30). SIA provides each prospective supplier the name of the entity issuing the RFQ (Request 1(g)(2)), the name of the entity receiving the requests* (Request 1(g)(3)), vehicle model (Request 1(g)(5)), instructions (Request 1(g)(6)), RFQ terms (Request 1(g)(7)), responses to the RFQ* (Request 1(g)(8)), any RFQ meetings 1(g)(14)), winning supplier (Request 1(g)(15)), and agreements/letters of intent* (Request 1(g)(16)).

- b. Most of the items in the preceding sub-paragraph are not supplier-specific, meaning the defendants would have the information regardless of whether non-defendant suppliers participated in, or even won, the RFQ. For a few requests above (i.e., those designated with a “*”), the defendants would have the information if at least one was a winning bidder (e.g., Requests 1(g)(13), 1(g)(16), 3, 23(2), and 30). Further, SIA’s RFQ process involves

the exchange of substantial information, including information about the process itself and the names of other significant bidders.

- c. Some information, such as SIA's cost estimates (see Request 1(g)(9)), evaluation of RFQs (see Request 14(c)), and RFQ summaries or recaps (see Request 1(g)(17)), may or may not have been shared with bidders. To the extent shared, the defendants would have the information. To the extent not shared, this information – such as target prices – has no bearing on whether the defendants conspired or the impact of such a conspiracy on prices.
- d. The only documentary information that SIA would not have exchanged with RFQ bidders concerns SIA's own internal evaluation of the RFQs and any target prices (Request 1(g)(11)). However, internal target prices are merely general pricing parameters SIA uses for planning purposes. If the competitive price for a component is above or below a target price, it is the competitive price, not the target price, that governs how much SIA pays for the component. Moreover, the target price is often influenced by historical costs for the same or similar products. Therefore, any price-fixing conspiracy that affects the price of a component is also likely to affect the target price.
- e. The RFQ database went live in November 2007; before that date, the RFQ process was entirely manual and in paper format.

26. At least 9 requests seek transactional data relating to the purchase of the components and assemblies at issue in this lawsuit. (Requests 1(a), 1(b), 1(c), 1(d)(1), 1(d)(2),

1(d)(3), 1(e), 1(f), 1(m)). The subpoena attaches names and descriptions to the components and assemblies at issue. Names and descriptions of automobile components and assemblies are not necessarily uniform across manufacturers.

27. SIA could not identify responsive transactional data without devoting significant time and effort to mapping the names and descriptions of components and assemblies to the part numbers and descriptions SIA uses within its own sourcing and purchasing systems. SIA anticipates this would involve the following steps:

- a. SIA would first have to search various electronic and paper repositories, by defendant supplier, to determine which components and assemblies (identified by SIA product codes and descriptions) SIA sourced from the defendant suppliers.
- b. SIA would then have to compare its product codes and descriptions to the names and descriptions the Parties have assigned to the components and assemblies at issue, to determine which SIA product codes and descriptions fall within the scope of the subpoena *for the defendant suppliers*.
- c. Next, SIA would have to revisit the electronic and paper repositories and search – by product codes for components and assemblies SIA sourced from defendant suppliers – to identify any non-defendant suppliers from which SIA sourced components and assemblies with the same product codes and/or descriptions.

- d. SIA would then need to conduct a third electronic and paper repository search, by relevant non-defendant suppliers, to determine whether SIA sourced additional components and assemblies from them.
- e. The final step would be for SIA to manually compare the descriptions and product codes for these additional components and assemblies to the names and descriptions of the components and assemblies at issue in this lawsuit, to determine whether the non-defendant suppliers sourced components or assemblies at issue.

28. Once SIA has searched the relevant electronic and paper repositories to identify the components and assemblies at issue in this lawsuit and the defendant and non-defendant suppliers from which SIA sourced them, SIA would need to search the relevant paper and electronic repositories for responsive information. This would include:

- a. SIA's RFQ database, which went live in November 2007. Before 2007, SIA's RFQ process was entirely manual and in paper format. To the extent responsive pre-2007 information exists, it is located in unindexed boxes, and various file cabinets, that SIA would have to search manually.
- b. SIA's pricemaster database, which went live in October 2012. Pricemaster data before that date exists, if at all, on SIA's old mainframe, which contains only part numbers, effective date, and price data. This information exists as a "flat file" which would be expensive and time-consuming to render in an understandable format.

29. I understand that the Parties claim they lack the internal product codes or part numbers SIA uses. However, several documents SIA and prospective suppliers exchange during the sourcing process, including purchase orders, contain SIA's internal part numbers.

30. At least 26 requests seek custodian documents relating to the purchase of components or assemblies. (Requests 1(g)(1-19), 1(l), 3, 14(c), 23(2), 28, 39, 33 seek upstream purchasing information). SIA currently employs 24 Buyers, and there has been considerable turnover in those positions throughout the period covered by the subpoena. SIA would be required to search at least these individual Buyers' (and possibly other employees') PCs and hard-copy documents to determine whether they possess responsive custodian documents. The types, amount, and methods of storage of hard copies vary by Buyer. In light of the purchasing information that defendant suppliers already possess through the exchange of information during the sourcing process, custodian documents are unlikely to provide significant additional benefit to the Parties and would impose an unreasonable and unrealistic burden on SIA.

Downstream Purchasing Information

31. The parties seek compliance with 28 requests relating to the (i) financial performance of SIA; (ii) the manufacture, distribution, and sale of vehicles; and (iii) the resale of those vehicles by dealers. The downstream sales requests include: 4(a)(1), 4(a)(2), 4(a)(3)(a), 4(a)(3)(b), 4(a)(3)(c), 4(a)(3)(d), 4(a)(3)(e), 4(a)(3)(h); 4(a)(3)(k); 4(a)(4); 4(a)(7), 4(a)(8), 4(a)(13), 4(b), 4(e), 4(h), 4(j), 5(a), 5(b), 5(c), 5(d), 5(e), 13(a), 13(b), 15, 16, 22, and 34. These request includes, among other things, the date of vehicle sale, purchaser contact information, model, model year, VIN number, invoice price, invoice date, invoice number, sale price, price adjustments, dealer holdback, quantity sold, financing terms, MSRP, terms and conditions, transaction numbers, insurance terms, warranty terms, associated incentives payments or bonuses, direct and indirect cost of each vehicle, production dates, floor plan financing and

terms, vehicle trade-ins, trade-in mileage, trade-in VIN, trade-in model, sales tax, fees, incentives, subsidies, rebates, bonuses, service agreements, fixed and variable cost of goods sold, cost of each part or component in the vehicle, overhead costs, manufacturing costs, marketing costs, distribution costs, gross profit, operating profit, and projected profit. The subpoena also requests policies, procedures, standards, methods, standards, decision-making, guidelines, factors, and reasons for determining, setting or prices; studies, analyses, research, and evaluations of vehicle markets and competitive conditions; studies, reports, analyses, procedures, research, or evaluations concerning the extent if any that changes in costs relate to the manufacture, sale, and price of new vehicles; and it requests all communications with dealerships regarding price. SIA, however, does not sell, and has never sold, finished automobiles to dealers. As each of these requests deals with post-component-purchasing activities, I refer to these requests as “downstream” requests.

32. The subpoena seeks information relating to SIA’s internal operations, none of which were affected by any overcharge on the price-fixed components. For example, Request 14(j) seeks information concerning SIA’s “gross profit, profit margin or level, operating profit, projected profit, net profit, and/or profit-and-loss statements.” This information has no bearing on the prices SIA pays for components or assemblies. This information is also highly confidential and closely-guarded. Moreover, producing this information would require accessing additional information systems, adding to the already substantial burden the subpoena imposes.

33. Similarly, Request 14(h) seeks documents related to direct, indirect, and estimated manufacturing, marketing, distribution, selling, and other costs, both fixed and variable for each vehicle, including parts not at issue in the case, management costs, labor costs, tooling costs, energy costs, sales and marketing costs, leasing costs, and R&D costs. None of these are

affected by the alleged price-fixing conspiracy. To the extent such information even exists in the form sought, trying to collect it would require substantial time and effort.

34. Certain other requests seek information which appears geared toward an attempt to trace a particular price-fixed component to a specific vehicle. While there are a select few parts, relating to specific safety components, for which SIA could accomplish this, there is no manageable way to do this for other components or assemblies. In effect, SIA would have to run a process akin to implementing a recall for each of the parts at issue in this case. This would involve substantial investigation time to identify by VIN number the specific vehicles that contain each part.

35. During the bidding process, SIA necessarily identifies for the prospective supplier each vehicle into which it will incorporate the part being bid. If the part is to be customized for a specific vehicle, the prospective supplier would necessarily know that as well. Even where a part is common across models or platforms, SIA provides prospective suppliers with its internal part number. Indeed, SIA could not pay suppliers for their parts unless their invoices (and related paperwork) reflect SIA's part numbers.

36. A number of requests focus on the relationship between the subpoena recipient and its dealers. SIA does not sell, and has never sold, vehicles to dealers.

Facially-Overbroad Requests Seeking Wholly-Irrelevant Information

37. Request 27 seeks all information submitted to any regulatory or governmental authority anywhere in the world over the last 20 years. This is not limited to information submitted in connection with any alleged price-fixing. This would include safety, fuel economy, products liability, and other investigations that have no bearing on the issues in this case. Collecting this information would be incredibly burdensome.

38. Request 33 seeks all documents comparing any component SIA purchased to either (i) components purchased by other OEMs, or (ii) components made by different suppliers. The former are engineering-based documents. As to the latter, SIA provides prospective suppliers substantial information on the relative merits of competing products during the bidding process. To the extent SIA has not shared a particular internal evaluation or comparison with prospective suppliers during the bidding process, it is either irrelevant to SIA's ultimate bid award, or it is confidential and proprietary to SIA, and it would be to SIA's extreme competitive disadvantage to produce it.

DATE: February 18, 2016

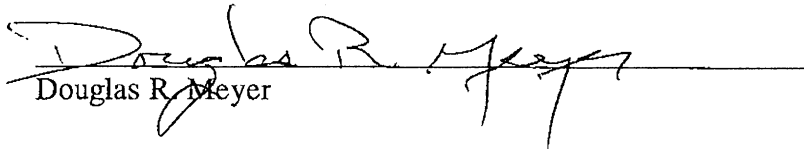

Douglas R. Meyer

Exhibit A

Subaru U.S. Market Share

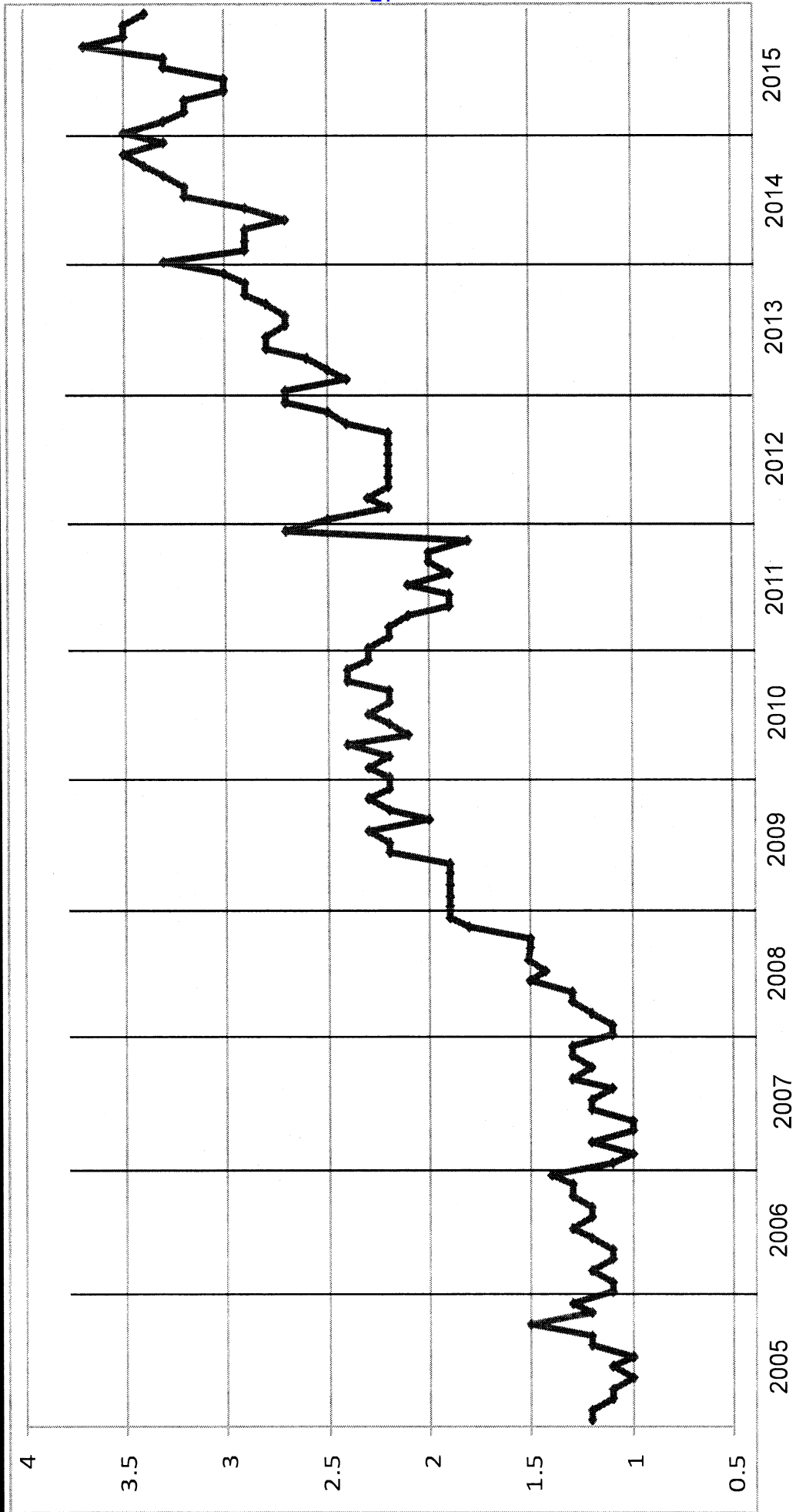


Exhibit B

SUBARU SHIPPING ACTUAL RESULTS

	1989			1990			1991			1992			1993			1994			1995				
	Sedan	Wagon	TOTAL	Sedan	Wagon	TOTAL	Sedan	Wagon	TOTAL	Sedan	Wagon	TOTAL	Sedan	Wagon	TOTAL	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL
JAN			0	1012	57	1069	2572	2364	4936	2613	2521	5134	1764	2735	4499	1487	1826		3313	2855	4182	443	7480
FEB			0	1233	328	1561	2233	2522	4755	2253	2406	4659	2821	1650	4471	1408	1964		3372	2018	4406	404	6828
MAR			0	949	905	1854	1827	2584	4411	2528	2736	5264	3157	2219	5376	355	394		749	1943	4328	524	6795
APR			0	806	978	1784	2314	2735	5049	2482	2560	5042	2244	2574	4818	835	1		836	1526	3526	570	5622
MAY			0	796	1156	1952	2351	2758	5109	2658	2097	4755	1445	2140	3585	1732	536		2268	1918	3731	822	6471
JUN			0	945	1022	1967	2329	2187	4516	3272	1966	5238	1525	2191	3716	1453	2107		3560	1743	4304	336	6383
JUL			0	1221	1222	2443	2412	1966	4378	2181	1814	3995	735	1790	2525	1150	2923		4073	1276	1558	1211	4045
AUG			0	1657	1478	3135	2100	3197	5297	2625	2481	5106	901	2990	3891	2571	4305	46	6922	1868	2302	2548	6718
SEP	10	0	10	1597	1520	3117	2371	2641	5012	2907	2127	5034	1286	2238	3524	2324	3583	557	6464	1531	2485	2858	6874
OCT	213	0	213	2249	1730	3979	2917	2870	5787	2698	2429	5127	1427	2399	3826	2891	4601	561	8053	1659	3386	3607	8652
NOV	497	0	497	2365	2629	4994	2714	2201	4915	1786	2627	4413	1508	2042	3550	2726	4608	126	7460	1614	2914	3668	8196
DEC	890	0	890	2571	2032	4603	2197	1583	3780	1324	2532	3856	1779	1556	3335	2806	3577	549	6932	906	2548	3142	6596
TOTAL	1610	0	1610	17401	15057	32458	28337	29608	57945	29327	28296	57623	20592	26524	47116	21738	30425	1839	54002	20857	39670	20133	80660

	1996				1997				1998				1999				2000				2001			
	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL	Sedan	Wagon	Outbk	TOTAL
JAN	1152	2645	3361	7158	1058	2323	5447	8828	2006	1723	4862	8591	1427	1195	5714	8336	1746	1092	6517	9355	1614	1074	7230	9918
FEB	959	2261	3664	6884	1247	2363	5316	8926	1742	1928	5588	9258	1491	1444	6341	9278	1158	1450	7857	10465	1398	832	6683	8913
MAR	790	2402	4696	7888	1224	1945	5322	8491	2011	1928	6088	10027	1260	1479	7093	9832	1092	1387	8759	11238	1761	1017	7749	10527
APR	605	2487	4543	7635	1239	2690	5930	9359	1553	2354	5282	9189	753	1073	4682	6508	690	1082	6174	7946	1398	944	6646	8988
MAY	373	1795	5922	8090	1366	2497	4719	8582	1078	898	6321	8297		16	303	319	822	1072	7318	9212	1235	861	6797	8893
JUN	887	1636	3287	5810	839	1962	3385	6186	1904	2290	4153	8347	27	878	3784	4689	1438	1329	6690	9457	1994	1388	5540	8922
JUL	1142	1616	4622	7380	1415	1260	4719	7394	1178	1487	3230	5895	354	1003	4136	5493	875	598	3017	4980	906	669	3317	4892
AUG	2809	2596	3987	9392	1532	2236	5570	9338	1367	2130	5275	8772	2410	1125	5817	9352	1599	1245	7011	9855	1812	1297	6569	9678
SEP	1793	3586	4480	9859	1650	2484	4991	9125	1364	2367	5627	9358	3055	1633	5714	10402	1209	1075	6324	8608	1317	1142	5525	7984
OCT	1837	3660	5910	11407	1693	3147	5298	10138	1197	2146	6530	9873	2982	1168	6765	10915	1516	1023	7384	9923	1637	1306	6732	9675
NOV	1268	2927	4878	9073	1124	2255	4561	7940	977	1590	5926	8493	2487	1032	6499	10018	1102	957	7721	9780	1651	803	5980	8434
DEC	1670	2861	3820	8171	959	2194	4720	7873	1112	1249	5773	8129	1791	834	5305	7930	1060	820	5746	7626	1141	580	4465	6186
TOTAL	15285	30292	53170	98747	15346	27356	59478	102180	17489	22085	64655	104229	18037	12880	62153	93070	14307	13130	80518	107955	17864	11913	73233	103010

	2002					2003					2004					2005					
	Sedan	Wagon	Outbk	Baja	TOTAL	Sedan	Wagon	Outbk	Baja	TOTAL	Sedan	Wagon	Outbk	Baja	TOTAL	Sedan	Wagon	Outbk	Baja	B9	TOTAL
JAN	1513	712	7129		9354	1473	1209	4240	1862	8784	1424	1119	5650	228	8421	2074	515	6582	375		9546
FEB	1427	875	6209		8511	1260	660	5293	1382	8595	776	734	4112	337	5959	2221	748	6659	414		10042
MAR	1530	708	6610		8848	1248	1095	5404	968	8715	4	688	2904	6	3602	1540	395	5034	431		7400
APR	1514	809	6769		9092	1615	762	5478	893	8748	1728	1217	4871	417	8233	1443	279	5293	442	2224	9681
MAY	1182	523	7288		8993	1804	450	5259	883	8396	2633	1377	4405	903	9318	1263	162	5640	311	3176	10552
JUN	1706	1168	5803		8677	1797	1422	4795	311	8325	2830	1191	4310	929	9260	1726	594	3810	302	2928	9360
JUL	909	1057	2667		4633	1065	751	3429	248	5493	2186	985	3198	563	6932	1168	600	3124	232	2670	7794
AUG	1633	2576	4723		8932	1568	1028	5362	401	8359	3071	1236	6080	1038	11425	2366	700	5111	368	4227	12972
SEP	1552	1490	4031	1980	9053	1501	1211	5546	245	8503	2994	942	6591	885	11412	2024	522	5129	378	3761	11814
OCT	1518	1728	4954	2503	10703	1700	1334	6170	225	9429	2466	309	7340	857	10972	1834	566	5344	378	3155	11277
NOV	1403	755	4791	2485	9434	1452	1144	4778	171	7545	2038	923	7214	622	10797	1541	389	5191	404	2847	10372
DEC	1111	431	3449	1592	6583	1103	1107	3730	161	6101	1719	727	6306	467	9219	1245	280	4039	324	2293	8181
TOTAL	16998	12832	64423	8560	102813	17586	12173	59484	7750	96993	23869	11448	62981	7252	105550	20445	5750	60956	4359	27481	118991

	2006					2007					2008					2009					
	Sedan	Wagon	Outbk	Baja	B9	TOTAL	Sedan	Wagon	Outbk	B9	TOTAL	Sedan	Wagon	Outbk	B9	TOTAL	Sedan	Wagon	Outbk	B9	TOTAL
JAN	1570	432	4974	713	1363	9052	1661	201	4949	855	7666	1875	50	3976	2546	8447	1521	37	2416	349	4323
FEB	1421	236	5122	1362	1450	9591	1480	243	4474	899	7096	1738	72	3974	2423	8207	2247	70	2582	637	5536
MAR	1765	320	4982	2174	1618	10859	730	757	5345	950	7782	1524	18	4220	1929	7691	2283	52	3192	617	6144
APR	1515	319	4192	831	1659	8516	2876	934	4364	506	8680	1199	31	5729	2269	9228	696	0	1133	207	2036
MAY	2059	303	5822		3130	11314	2775	1522	3842	2037	10176	2518	80	5172	1502	9272	1384	0	3	308	1695
JUN	1332	250	4037		2300	7919	2357	846	4540	3513	11256	2390	143	5212	1168	8913	2542	0	3983	15	6540
JUL	1229	255	3183		1103	5770	1050	667	2361	2038	6116	1244	51	2783	557	4635	1518	0	3963	21	5502
AUG	1842	415	4938		1788	8983	2617	929	4281	3664	11491	2919	96	4362	1808	9185	3128	0	5962	183	9273
SEP	2039	469	4743		2461	9712	2262	995	4045	2256	9558	2971	87	3743	1265	8066	3350	0	7293	207	10850
OCT	2273	477	5762		2237	10749	2444	961	5356	2853	11614	2744	60	3546	1458	7808	2907	0	8053	588	11548
NOV	1912	623	6291		1168	9994	2274	767	4654	2498	10193	2691	23	1840	792	5346	2618	0	6979	306	9903
DEC	1537	218	5414		745	7914	1798	602	3001	2149	7550	2630	16	1746	391	4783	3945	0	5175	483	9603
TOTAL	20494	4317	59460	5080	21022	110373	24324	9424	51212	24218	109178	26443	727	46303	18108	91581	28139	159	50734	3921	82953

	2010				2011				2012				2013				2014				2015			
	Sedan	Outbk	B9	TOTAL	Sedan	Outbk	B9	TOTAL	Sedan	Outbk	B9	TOTAL	Sedan	Outbk	B9	TOTAL	Sedan	Outbk	B9	TOTAL	Sedan	Outbk	B9	TOTAL
JAN	3651	7100	639	11390	4315	9717	672	14704	4991	12097	413	17501	4657	11883	208	16748	3060	11215	209	14484	5290	13934	19224	
FEB	4296	7257	587	12140	4102	9930	582	14814	5094	11919	361	17374	4237	11572	210	16019	3032	10409	0	13441	6127	13892	20019	
MAR	4485	8728	653	13866	4138	10056	635	14829	5436	12369	380	18185	3933	12468	293	16694	3488	12396	0	15884	5677	12548	18225	
APR	3183	9654	345	13182	2879	5805	416	8900	3574	10925	378	14877	4457	11469	318	16244	3180	12996	0	16176	5517	13654	19171	
MAY	1585	4788	309	6682	3536	7634	542	11712	3517	11535	326	15378	3837	10563	324	14724	2761	11154	0	13915	5015	13169	18184	
JUN	4609	15037	420	20066	3491	8608	551	12650	3539	11146	264	14949	3780	9251	335	13366	5184	6581	0	11765	5966	14476	20442	
JUL	1949	5524	192	7665	1795	4281	297	6373	2155	5708	248	8111	2170	5333	258	7761	3986	5023	0	9009	3185	7648	10833	
AUG	4078	11482	261	15821	4028	9194	401	13623	5237	13250	420	18907	3649	10877	191	14717	7599	12685	0	20284	6418	15644	22062	
SEP	3530	10361	480	14371	4297	10505	559	15361	4907	10672	350	15112	2645	10733	152	15530	6964	13979	0	20943	6063	15119	21182	
OCT	4456	10423	582	15461	5031	12010	717	17758	5090	10665	342	17014	3082	12745	170	15997	6545	16230	0	22775	8165	16323	22468	
NOV	4353	10138	606	15097	4729	11181	658	16568	4499	10496	343	15338	2405	10717	151	13273	4975	13028	0	18003	5601	13723	19324	
DEC	3615	8192	474	12281	4427	9831	366	14824	5264	13022	331	12037	1948	7943	199	10090	4231	12112	0	16343	4978	12672	17650	
TOTAL	43790	108684	5548	158022	46568	108752	6396	161716	50403	130224	4156	184783	40800	125554	2809	169163	55005	137808	209	193022	66002	162802	228804	